

Jerard A. Gonzalez
Bastarrika, Soto, Gonzalez & Somohano LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel: (201) 489-1351
Fax: (201) 489-1353
jgonzalez@bsgslaw.com
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
NEWARK, NEW JERSEY**

ALEXANDER ZAHARRIS

Plaintiff,

v.

KIRSTJEN NIELSEN, SECRETARY
OF UNITED STATES DEPARTMENT
OF HOMELAND SECURITY;
LEE FRANCIS CISSNA, DIRECTOR OF UNITED
STATES CITIZENSHIP AND IMMIGRATION
SERVICES;
PAULO CORREIA,
FIELD OFFICE DIRECTOR OF
NEWARK USCIS FIELD OFFICE;
JOHN THOMPSON, DISTRICT DIRECTOR OF
NEWARK USCIS OFFICE;
U.S. DEPARTMENT OF HOMELAND SECURITY;
and
UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES;

Defendants.

Case No. 2:19-CV-06510-JMV

**Motion to Withdraw Petition
for Writ of Mandamus and
Complaint for Declaratory
Relief**

Immigration Case

**MOTION TO WITHDRAW PETITION FOR WRIT OF MANDAMUS AND
COMPLAINT FOR DECLARATORY RELIEF**

Plaintiff Alexandra Zaharris respectfully moves this Court to withdraw the pending Petition for Writ of Mandamus and Complaint for Declaratory Relief. In support of this motion, Plaintiff submits the following:

- (1) On or about February 21, 2019, Plaintiff filed a Petition for Writ of Mandamus and Complaint for Declaratory Relief. In the petition, Plaintiffs requested that the Court enter an order that Defendants adjudicate Plaintiff's I-751 Petition to Remove Conditions on Permanent Residence.
- (2) Shortly after the petition and complaint were filed, Defendant U.S. Citizenship and Immigration Services ("USCIS") issued an interview notice for Plaintiff to appear for an interview. USCIS subsequently issued a decision in the matter.
- (3) Since the I-751 Petition has been adjudicated by USCIS, Plaintiff respectfully requests to withdraw the Petition for Writ of Mandamus and Complaint for Declaratory Relief.

Respectfully submitted,

/s/ Jerard A. Gonzalez

DATED: 4/24/19

SO ORDERED.

s/ John Michael Vazquez

John Michael Vazquez, U.S.D.J.

Date: 4/24/19

Jerard A. Gonzalez
Bastarrika, Soto, Gonzalez & Somohano LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424
Tel: (201) 489-1351
Fax: (201) 489-1353
jgonzalez@bsgslaw.com
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY
NEWARK, NEW JERSEY**

ALEXANDERA ZAHARRIS

Plaintiffs,

v.

KIRSTJEN NIELSEN, et al.

Defendants.

Case No. 2:19-CV-06510-JMV

ORDER

Immigration Case

This matter having been brought by Plaintiff Alexandra Zaharris (herein after “Plaintiff”), through Jerard A. Gonzalez, attorney for Plaintiff and with notice to the United States Attorney’s Office, Newark, N.J., and upon request of the Plaintiff, it is hereby

ORDERED that Plaintiff’s Petition for Writ of Mandamus and Complaint for Declaratory Relief be WITHDRAWN.

Dated: _____, 2019

United States District Court Judge

CERTIFICATE OF SERVICE

I, Cheryl Lin, Associate at Bastarrika, Soto, Gonzalez & Somohano LLP, certify that on April 24, 2019, I caused the foregoing document to be electronically filed with the Clerk of Court for U.S. District Court, District of New Jersey by using the CM/ECF system. Service of the document will be provided to Defendants' counsel through the CM/ECF system.

/s/ Cheryl Lin

Cheryl Lin
Bastarrika, Soto, Gonzalez & Somohano LLP
3 Garret Mountain Plaza, Suite 302
Woodland Park, NJ 07424